UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

Case No. 1:24-cv-22281-LEIBOWITZ

TUSH	BABY, INC.,
v.	Plaintiff,
BUBULA,	
	Defendant.

MOTION TO REOPEN CASE

Pursuant to the Court's August 9, 2024 Order [ECF No. 12], Plaintiff Tushbaby, Inc., through counsel, files this motion to reopen this case. As grounds, Plaintiff states:

- 1. On August 9, 2024, the Court severed several defendants from this case and administratively closed the case pending (1) the filing of an amended complaint against the sole non-severed defendant Bubula and (2) the filing of a motion to reopen the case.
- 2. On August 23, 2024, Plaintiff filed its operative Amended Complaint naming Bubula. [ECF No. 13].
- 3. Plaintiff also filed new cases against the severed defendants, which the Court then consolidated into this case.
- 4. Accordingly, Plaintiff now seeks to reopen this case so that it may continue to prosecute its case.

WHEREFORE, Plaintiff Tushbaby, Inc. respectfully requests that the Court reopen this case for further proceedings.

Dated: September 5, 2024

Respectfully submitted,

James M. Slater
James M. Slater (FBN 111779)
ESCA Legal LLC
9000 Dadeland Blvd. #1500
Miami, FL 33156
Tel.: (305) 523-9023
james@esca.legal

Leo M. Lichtman (admitted *pro hac vice*) ESCA Legal LLC 1117 Sixth Avenue, Fifth Floor New York, New York 10036 Tel.: (347) 745-2535 leo@esca.legal

Attorneys for Plaintiff Tushbaby, Inc.